

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Western District of Texas

United States of America  
v.

Case No.

Anthony Tew  
Defendant(s)

EP20MJ2740-ATB

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 7/17/2020 in the county of El Paso in the  
Western District of Texas, the defendant(s) violated:

Code Section

Offense Description

Title 18 U.S.C. § 2422 (b)

Attempted Coercion and Enticement to engage in sexual activity of an  
individual who had not attained the age of 18 years.

This criminal complaint is based on these facts:

See attached affidavit.


☒ Continued on the attached sheet.

- ☐
- Sworn to before me and signed in my presence.
- 
- ☐
- Sworn to telephonically and signed electronically.

Date: 7/20/2020City and state: El Paso, Texas  
Complainant's signature

Michael R. Burgess, Special Agent

Printed name and title

  
Judge's signature

ANNE T. BERTON, U.S. Magistrate Judge

Printed name and title

Oath Telephonically Sworn  
Date: 7/20/20  
At 11:41 AM/PM  
Fed.R.Crim.P 4 1(b)(2)(A)

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Special Agent ("SA") Michael R. Burgess, herein after "Affiant," being duly sworn do hereby depose and state:

1. Affiant is a SA with the Federal Bureau of Investigation ("FBI") assigned to the El Paso Division. Affiant has been employed with the FBI since March of 2019 and is currently assigned to a squad that investigates child exploitation and human trafficking crimes. Affiant knows it is a violation of federal law for a person using any facility or means of interstate commerce, or within the special maritime and territorial jurisdiction of the United States, to knowingly persuade, induce, entice or coerce any individual who has not attained the age of eighteen (18) years, to engage in any sexual activity for which any person can be charged with a criminal offense, or to attempt to do so, as it is a violation of Title 18, United States Code, Section 2422(b). The statements contained in this Affidavit are based on Affiant's experience, background as a SA, and on information provided by other law enforcement officers ("Investigators").
2. The information contained herein is based upon Affiant's investigation as well as information supplied by other Investigators. Your Affiant has not included all facts known concerning this matter, but only facts necessary to set forth probable cause.
3. A FBI Online Covert Employee ("OCE") created a fictitious online persona of an 18-year-old female located in Las Cruces, NM and posted a profile reflecting this fictitious persona on MeetMe, a social media messaging application. However during the OCE's conversation with the individual identified below, the OCE identified herself as 13-years-old.
4. MeetMe is a free mobile application that permits users to send text messages and other content, including videos and images, to each other over the internet. The internet is a facility of interstate commerce.
5. On July 17<sup>th</sup>, 2020, the OCE informed Affiant that an individual subsequently identified by the FBI as **Anthony Tew** was communicating with the OCE and that the communications involved Tew's attempt to engage in sexual activity with what Tew believed to be a 13-year-old girl.
6. The OCE first became aware of Tew when the OCE, acting in an undercover ("UC") capacity, was conducting investigations into the enticement of minors on the MeetMe social media messaging application while posing as a fictitious 13-year-old female. Between July 14<sup>th</sup>, and July 16<sup>th</sup>, 2020, the OCE was contacted by a MeetMe user communicating under the profile name "Ant." During their MeetMe communications, the OCE disclosed her age as 13-years-old to "Ant". "Ant" acknowledged the OCE's age at least four times during the MeetMe conversation.
7. On July 15<sup>th</sup>, 2020, the OCE provided "Ant" with her cell phone number for "Ant" to text the OCE through basic text messaging service, instead of the MeetMe application.
8. "Ant" initiated a text message conversation with OCE using telephone number ending in 0200.

9. Beginning July 15<sup>th</sup>, through July 17<sup>th</sup>, 2020, the OCE and “Ant” communicated via text message. The OCE identified herself as 13-years-old at least twice during their text message conversation. 0200 identified himself as “Ant” or “Anthony”. “Anthony” identified himself as 36-years-old and acknowledged the OCE’s age at least twice during the conversation. OCE and “Anthony” engaged in sexual conversation to include various sexual acts that “Anthony” stated he wished to engage in with the OCE.
10. The following are excerpts from the MeetMe and text message conversation between “Anthony” and OCE. It does not display the conversation in its entirety:

**July 16<sup>th</sup>, 2020, 11:51 a.m. (MST) via MeetMe**

- Anthony - “You call older guys daddy when they are fucking you, or you are dating them don’t you? Are you one of those types of girls?”
- OCE - “Lol I only been with one and no I didn’t call him daddy”
- Anthony - “lol, oh.. how old was he?”
- OCE - “24”
- Anthony - “Lol, ok that’s why. Most younger guys, especially when they don’t have kids, won’t like it or say anything about it, but older guys like me who have kids and are kinky af. Like it, idk why we just do,
- Anthony - “And sometimes it helps us more experienced guys who last longer cum faster.”
- OCE - “Oh rly?”
- Anthony - “I’ll put it this way, when you decide your done with me, you’ll be so good, that you’ll have a guy cum in your mouth in like 2 strokes of your lips.”
- Anthony - “He’ll become a 2 pump chump.”
- Anthony - “I can teach you things, position you didn’t think you could do, and eat you out in anyway you could only see in porn.”

**July 16<sup>th</sup>, 2020 4:29 p.m.– 4:36 p.m. (MST) via Text Message**

- Anthony - “I just think you’re going to have trouble handling it. lol”
- OCE - “Lol see ur doubtful of me. Just not about being scared lol”
- Anthony - “lol, ya but not about being scared like you thought. I didn’t doubt you being scared. Just handling my cock. Haha
- OCE - “Lol well idk what to tell u then”
- Anthony - “lol, well you’ve only been with one guy, means you’re super tight, and that means it’s going to be hard for me to not only get it in. But not hurt you at first too unless you enjoy pain. lol”

**July 17<sup>th</sup>, 2020 4:10 p.m. – 4:19 p.m. (MST) via Text Message**

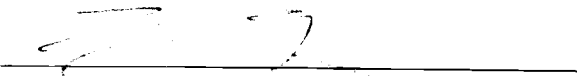
- Anthony - “Ya, and parents sometimes tell little white lies, because they think they are protecting their kids from danger. Such as older guys, known as pedophiles,

which they would consider me one, and the dangerous ones who would do worse than just fuck you.

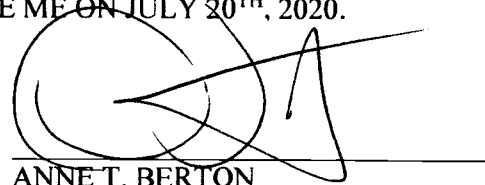
- OCE – “Well I don’t think he’d lie to me”
- Anthony – “Haha, you don’t know parents very well. We do even if our kids don’t think we ever would, and even if we tell them we won’t.
- OCE – “Lol well that’s messed up”
- Anthony – “You’re not my kid, I’m not going to lie to you. I can go to jail if we get caught. I’ve never been with someone as young as you, young, but not your age. When my ex-stepdaughter was young I thought about it with her, plenty of times, but she was never interested in me like that. I saw her naked plenty of times though.
- Anthony – “So I’ve always thought about it, never acted on it. 18 has been the youngest so far, and my ex-stepdaughter is 19 now. Lol”
- OCE – “Well if u don’t want to we don’t have to do anything”
- Anthony – “No I do.”

11. On July 16<sup>th</sup>, 2020, the OCE informed Anthony that they would be at her cousin’s house the following day in El Paso, Texas on July 17<sup>th</sup>, 2020. Anthony stated it would take him approximately 40 minutes to get to her house and asked the OCE if her cousin had any cameras around the house. The sexually explicit conversations continued as they discussed their plan to meet.
12. The OCE requested Anthony first meet her at a park, near their cousin’s house, to which Anthony agreed. Anthony arrived at the park location and the OCE provided the address to her cousin’s residence, located in El Paso, Texas which is in the Western District of Texas. The OCE told Anthony to knock on the door when he arrived at the residence.
13. On July 17<sup>th</sup>, 2020, Anthony traveled from the park location to the residence, parked near the house, exited his vehicle and approached the front door of the residence. At that time a female Agent stuck her head out of the front door and waved to Anthony. Anthony attempted to follow the female Agent in to the home, at which point Agents initiated the arrest. Agents attempted to take custody of Anthony, who fled and was subsequently apprehended by Agents in front of the residence. A search of Anthony revealed that he was carrying condoms on his person. During their conversation via text message on July 17<sup>th</sup>, 2020, Anthony stated “Yep, I mean I’ll wear a condom, because ya there will be a few times I’ll want to cum in that super tight ass pussy. Lol. Plus, I might try to get you to experience some other things for the first time.”
14. After being advised of his Miranda Rights, Anthony agreed to speak with Investigators without a lawyer present. An audio/video recorded interview was performed wherein Anthony admitted that he communicated with the OCE, who he initially thought was a 19-year old female, but later identified themselves as a 13-year-old female. Anthony stated he met the OCE on the MeetMe application and then transitioned to texting with the OCE. Anthony stated he messaged the OCE from his home in Las Cruces, NM. Anthony drove directly from his home in Las Cruces, NM, in his own vehicle, to the park located in El Paso, TX, and then to the residence located in El Paso, TX to meet with the OCE.

15. Anthony stated he sent the messages to the OCE using his cellular telephone, which was on his person at the time of his arrest. Anthony stated all communications with the OCE occurred on his cell phone, which no one else had access too. Anthony confirmed his name on MeetMe was "Ant". Anthony stated part of the chats occurred over the MeetMe application and the rest occurred via the text messaging application. Anthony acknowledged the OCE told him they were 13-years-old.
16. Anthony acknowledged he would be considered a pedophile for having sex with someone who was underage. Anthony stated he talked about being attracted to his ex-stepdaughter as a way to appeal to the OCE's 13-year-old self. Anthony stated he travelled to the residence because people can lie over text and he needed to verify the OCE's age in person. Anthony stated if he confirmed the OCE was underage he would parent her and warn her about the dangers of letting strange men in to her home.
17. Anthony admitted to sending pornographic images and gifs from the internet to the OCE. Anthony also acknowledged he sent a screenshot of a video of himself and a 19-year-old female performing a sexual act together. Anthony stated you could not see him in the video, just part of his leg, and that he knew better than to send sexually explicit material of himself to a 13-year-old.
18. Anthony acknowledged he made no effort in his communications with the OCE to determine if the OCE was anything other than 13-years-old. Anthony also admitted to making no other effort to determine the OCE's true age before he arrived at the front door of the OCE's location.
19. Anthony provided consent to search the telephone on his person, an iPhone 11 (iPhone) as well as his personal vehicle.
20. There is reason to believe, and your Affiant does believe, there is probable cause that **Anthony Tew**, while using a facility of interstate and foreign commerce, did knowingly attempt to persuade, entice, or coerce an individual who had not attained the age of 18 years, to engage in sexual activity, so in violation of Title 18, United States Code Section 2422(b) Coercion and Enticement.

  
Special Agent Michael R. Burgess  
Federal Bureau of Investigation

SUBSCRIBED AND SWORN TO BEFORE ME ON JULY 20<sup>TH</sup>, 2020.

  
ANNE T. BERTON  
UNITED STATES MAGISTRATE JUDGE